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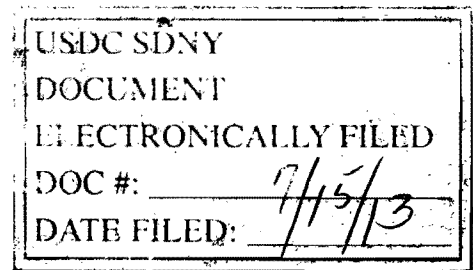
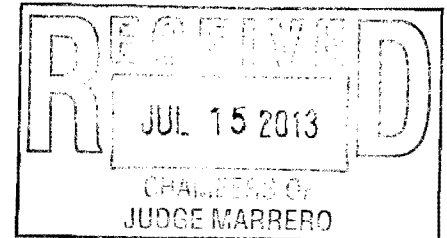
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July 12, 2013

**BY HAND**

Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007



Re: *United States v. Trucchio, et al*, S1 11 Cr. 614 (VM)  
Our Client: Natalia Ivanova

Dear Judge Marrero:

We write to advise the Court of our intention to file certain motions on behalf of our client Natalia Ivanova who is charged with conspiring to commit or aid and abet the commission of marriage fraud. Trial in this matter is scheduled to commence on December 4, 2013. The motions which we intend to make on Ms. Ivanova's behalf are: (1) a motion to suppress post-arrest statements by her and evidence seized from her on November 30, 2011 in violation of her 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup> Amendment rights;<sup>1</sup> and (2) a motion to compel particularization of the particular fraudulent marriages in which it is alleged Ms. Ivanova participated. The former motion may require a brief hearing.

We propose the following schedule: Defense motions to be made by next Friday, July 19, 2013; Government response to be made by August 2, 2009; hearing date, if any, to be set by the Court.

<sup>1</sup> This motion will be premised upon the refusal to grant Ms. Ivanova's request to call her attorney when the agents entered her home to arrest her on November 30, 2011 and their subsequent interrogation of her following this assertion of her right to counsel.

KELLEY DRYE & WARREN LLP

Honorable Victor Marrero  
March 19, 2013  
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Thank you for your consideration of this matter.


Very truly yours,

*Don Buchwald*

Don D. Buchwald

DDB:lgs

cc: AUSAs Jonathan Cohen and Rachel Maimin (by ecf)

Request GRANTED. The briefing schedule with regard to the motion of defendant <u>Natalia Ivanova</u> herein is approved as set forth herein: motion papers submitted by <u>7-19-13</u> ; response <u>8-19-13</u> ; reply _____	
SO ORDERED.	
<u>7-15-13</u> DATE	 VICTOR MARRERO, U.S.D.J.